

BEFORE THE
CIVIL AERONAUTICS BOARD
WASHINGTON, D.C.

Part 255--Carrier-Owned Computer
Reservations Systems--EDR-475

Docket 41686

REPLY COMMENTS OF
EASTERN AIR LINES, INC.

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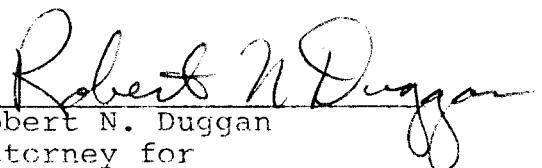
September 4, 1984

Many of the comments that have been submitted in response to EDR-475 have asked for even greater regulatory requirements to be imposed by the Board. Just as examples, these have taken the form of requests for a greater number of connecting points (e.g., 15); a requirement that hubs be chosen on certain criteria such as "elapsed time" or "most direct route"; a requirement "that any carrier's principal hub or hubs" be included apart from the Board's rule regarding nine hubs; a rule regarding city-pairs involving two or more connections so as to include capacity to handle not less than eleven double connect point routings; a requirement for the integration of direct connecting flights "on the basis of quality of service" and a "prominent notice" that connections are available over additional points; and a requirement that the first screen must identify any connect point not included in the display.

It is obvious that these many requests go far beyond the Board's proposed rule and ask the Board to participate in "regulatory overkill." The proposal in EDR-475 should not be expanded as requested in the comments. There has not been a valid showing that would begin to justify the many additional regulatory restraints that are asked to be imposed upon CRS vendors regarding the display of connecting flights. With regard to the proposal in EDR-475 for nine connect points, the Board stated, among other things, that it "...has a strong possibility of substantially reducing the connect point bias problem without imposing substantial costs." In light of this, the Board should reject those suggestions that go far beyond its proposal.

For all of the above reasons, Eastern strongly urges the Board to reject the requests for greater regulatory requirements than those set forth in EDR-475.

Respectfully submitted,


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September 4, 1984

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Reply Comments have been served upon all parties included on the Service List of this docket.


Robert N. Duggan

September 4, 1984